

## Response to the Productivity Commission Review of Childcare and Early Childhood Learning

### SUMMARY

- I support the strong support for the NQF. This needs to be continued as it has been operational a very short time.
- I support the recommendation for an additional \$1.3 billion expenditure on ECEC.
- I support the introduction of a single, streamlined subsidy that is transparent and equitable than CCB and CCR, and based on 'reasonable costs' not 'deemed' costs.
- I support block funding for Disadvantaged Communities Program
- Requiring families to meet an activity test of 24 hours of work, study or training per fortnight may put children at harm. Varied research shows that children who attend long day care centres in Australia do better than those who do not attend formal early childhood settings.
- A long-term ECEC strategy needs to have *children's rights and interests* at its core, not the short term economic growth of the economy. This requires good Quality early childhood education and care delivered by qualified early childhood educators; at the minimum research shows Diploma training is required. This actually is a wise and sustainable financial investment for Australia.
- ECEC in Australia requires an integrated suite of policies providing families with young children with *TIME, CASH and SERVICES*
- ECEC educators needs a workforce strategy addressing: wages and conditions, recruitment, retention, career paths and work/life balance. The Productivity Commission Draft Report talks about supporting women in the workforce, but does not address the need to support early childhood educators, who are mostly women (approximately 97%). The PC needs to broaden its perspective here.
- If ECEC educators are not supported then it is likely the high attrition rate will continue, which in turn will place further stress on families, and will be a poor investment for the children of Australia.
- Early childhood education in Australia needs to be bi-partisan and not the result of politics. This is bad for children, families, the economy (it may benefit a minority) and bad for Australia.

### PC suggested recommendations regarding Regulations:

1. **The PC Draft report recommends** educators working with children aged birth to 36 months only required to hold at least a Certificate III, or equivalent. Australian research based on the Longitudinal Study of Australian Children (Coley et al, 2013) provides critical evidence of the positive effects of children commencing childcare at two years of age were found to be performing BETTER on literacy and numeracy at school, than their peers. The effects were attributed to 'part-time centre-based care' (p. 45), which is the pattern most commonly used by Australian parents. According to the International Labor Organization (2012, p.36):

*integration between care and education is essential, irrespective of whether ECE organization is split between childcare from birth to 3 years and from 3 years to start of school, or is a unitary model covering the entire age range from birth to the start of compulsory schooling.*

According to the longitudinal Effective Provision of Preschool Education (EPPE) study in the United Kingdom, the early childhood education programmes with the biggest impact combined education and care (Sylva et al. 2003).

ECTs undertake practices that lesser qualified/unqualified staff are less inclined to do (Whitebook, 2003) such as more interactions with children; more in-depth observation and monitoring of children's development; more warm, responsive, sensitive and stimulating interactions (and

therefore less authoritarian, punitive, and detached interactions). These practices were found to lead to higher levels of classroom quality, and better and more sustained developmental outcomes for children (socio-emotional, language, cognitive). Children with access to an ECT demonstrated more persistence with tasks and more co-operative behaviours; engaged in high-level peer play, and were less likely to wander aimlessly.

2. Regarding recommendation: *The number of children for which an early childhood teacher must be employed is assessed on the basis of the number of children in a service aged over 36 months:* All children deserve good quality ECEC delivered by an early childhood trained teacher. Therefore it is essential that persons with early childhood teacher qualifications **continue to be required** to have practical experience for children aged birth to 24 months. EC teachers are likely to become Directors of early childhood settings, and while not required to teach 0-2 years as part of the National Regulations may be part of the teaching requirement in NSW. UNESCO Policy Brief on Early Childhood states that:

*The workforce in early childhood in all countries must respond to two related developments: the divide between care and education is breaking down; and the professional role is becoming more complex, with growing recognition of the importance of working with parents and other services and of the competence of young children as learners (Moss, 2004).*

Staffing levels should never be allowed to be below required ratios. This would make the early childhood environment unsafe for children, and cause extra stress for staff. If early childhood workforce issues were adequately addressed, such as including good pay rates and working conditions, and staff were valued, then there would be not be the staff shortages that are reported. Staff-child ratios “is generally the most consistent predictor of high-quality learning environments” (OECD 2012, p. 35)

3. Staff: child ratios and qualifications of staff are harmonised across Australia **only if the highest common denominator is adopted**, not the lowest. Parents are assured for their child's wellbeing when their children are with a trained educator.
4. Combining all early childhood services under the one national umbrella aims to create a holistic approach to service delivery. A unified approach makes it easier:
  - To reduce opportunities for children to fall through gaps in the system
  - For authorities to monitor and assure quality
  - For costs of monitoring and assuring quality to be centralised under one authority and not distributed across different departments within each jurisdiction
  - For families and community to develop appropriate expectations of early childhood services, to recognise quality and to respond to poor quality appropriately
  - For early childhood professionals to move between different service types as they build their careers

The Terms of Reference place children’s needs as secondary to that of adult workforce participation. In relation to Australia, the OECD Country Note on Australia for it’s Thematic Review of Early Childhood and Care in 2001 made the following comment:

*The ad hoc development of early childhood policy over the years in relation to the needs of parents, the workplace, and the economy, has tended to subsume the needs and interests of children as being synonymous. There are tensions in this, and it is opportune to reflect on current policy priorities from a perspective that places the interests and needs of children to the fore. (OECD, 2001, p.37)*

5. The NQF has only been operational since 2012, and should be evaluated and assessed for quality improvements. Early childhood education in Australia needs to maintain the NQF. The NQF should undergo ongoing continuous improvement by conducting an evaluation of the process after all services are assessed.

*“...The National Quality Framework quality standards are not ambitious, they fall short of the precedents set by ECEC systems overseas in terms of the qualifications required by early childhood staff and compare poorly with those quality standards that are taken for granted in the school education system” (Price Waterhouse Coopers 2011).*

6. Sustainability should continue to be retained in the NQS. It is essential that young children are introduced to and become advocates for their world. If elements and standards of the National Quality Standard are causing some centres anguish as anecdotally reported in the PC Draft report, such as sustainability as reported on page 275, then these can be remedied by re-training assessors more explicitly in these areas, and offering professional development for educators how to meet these standards. NCAC printed a monthly newsletter highlighting various aspects of practice that centres struggled with.
7. Preschool children should NOT be able to be part of an OOSH service. OOSH currently does not have Nationally consistent regulations, including no stated staff to child ratios in some states. If preschool children were allowed to be part of OOSH then we would see 3-5 year olds in large groups- this would place undue concerns on safety of the children, and further stress on staff.
8. If Nannies are introduced as part of the funding then they should be required to hold the same qualifications as Family Day Care workers and practice according to the same regulatory conditions as Family Day Care workers, including being a member of an accredited scheme, under the supervision of an appropriately trained supervisor, and the environment be assess for safety.